

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Azeez Gayfa-Al-Din Bey

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

One 80 Place
Hope Center

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 2:23-cv-06035-RMG-MHC

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|-------------------------------------|
| Name | <u>Azeez Sayfa Al-Din Bey</u> |
| Street Address | <u>18 Hanover St.</u> |
| City and County | <u>Charleston Charleston County</u> |
| State and Zip Code | <u>South Carolina 29403</u> |
| Telephone Number | <u>(803)-341-7996</u> |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

| | |
|----------------------------|--------------------------------------|
| Name | <u>One 80 Place</u> |
| Job or Title (if known) | <u>Homeless Shelter Organization</u> |
| Street Address | <u>35 Walnut Street</u> |
| City and County | <u>Charleston</u> |
| State and Zip Code | <u>South Carolina 29403</u> |
| Telephone Number | <u>(843) 723-9477</u> |

Defendant No. 2

| | |
|----------------------------|-------------------------------------|
| Name | <u>Hope Center</u> |
| Job or Title (if known) | <u>Social Services organization</u> |
| Street Address | <u>529 Meeting St.</u> |
| City and County | <u>Charleston</u> |
| State and Zip Code | <u>South Carolina 29403</u> |
| Telephone Number | <u>(843) 579-6399</u> |

Defendant No. 3

| | |
|------|--|
| Name | <u>Neighborhood House Community Outreach</u> |
|------|--|

Job or Title (if known) Non-profit Organization
 Street Address 77 America St. E
 City and County Charleston
 State and Zip Code South Carolina 29403
 Telephone Number _____
 Defendant No. 4 _____
 Name _____
 Job or Title (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Zodiac Constitution Article 4
United Nations Declaration on the Rights of Indigenous Peoples Article 2,
Privacy Act Section 7 93-579 ; 42 USC § 1983 (e) 8

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Azeez Sayfor Al-Din Bba, is a citizen of the State of (name) North America

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) ONE 80 PLACE, is incorporated under the laws of the State of (name) SOUTH CAROLINA, and has its principal place of business in the State of (name) SOUTH CAROLINA. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____. see attached

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

The defendant, (name) HOPE CENTER, is incorporated under the laws of the State of (name) SOUTH CAROLINA and has its principal place of business in the State of (name) SOUTH CAROLINA.

The defendant, (name) Neighborhood House Community Outreach, is incorporated under the laws of the State of (name) SOUTH CAROLINA, and has its principal place of business in the State of (name) SOUTH CAROLINA.

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The psychological trauma I have faced since being unable to be employed and not having adequate housing has damaged my mental health.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I have been denied housing from One80 Place since 9-15-2023 because I do not possess a SSN as well as on account of my National Origin. The Hope Center in league with One80 Place has also denied me housing and work due to National Origin and not possessing a SSN.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am seeking \$3000,000 in damages done to me for the blatant denial and discriminatory actions of the organizations in withholding assistance to procure employment based on my National origin.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/28, 2023

Signature of Plaintiff

Printed Name of Plaintiff

Azeer Sayfa Al-Din Bey
Azeer Sayfa Al-Din Bey

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____